and the second s

Serial No.: 10/663,719 Attorney's Docket No.: MSS0006-US Page 9

Art Unit: 2819

Inventor: Steve YANG et al.

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 3-8 and 11-16 were pending in this application. Claims 3, 6, 11, and 14 have been amended hereby and new claims 17-22 have been added. Accordingly, claims 3-8 and 11-22 will be pending herein upon entry of this Amendment. Support for the amendment to each of the claims can be found, for example, at page 6, lines 24-25 of the present application. For the reasons stated below, Applicants respectfully submit that all claims pending in this application are in condition for allowance.

In the Office Action, claims 3-7, 11, 12, 14 and 15 were rejected under 35 U.S.C. §102(b) as being anticipated by Hiller (U.S. Patent 5,187,481). Claims 8, 13 and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hiller in view of Brooks (U.S. Patent 6,577,257). These grounds of rejection are respectfully traversed for the following reasons.

As set forth above, independent claims 3, 6, 11 and 14 have been amended to recite the limitation of "wherein said pseudo random sequence length is substantially greater than said frame length." This feature is supported by the disclosure at page 6, lines 24-25. The digital image signal of the present invention is provided in the form of frames, each of which includes several pixel data, such that the period for providing the pixel data per frame is the frame length. The dither signal, generated by the pseudo random binary sequence generator is provided with the pseudo random sequence length that is greater than the frame length in accordance with the

Serial No.: 10/663,719 Attorney's Docket No.: MSS0006-US

Art Unit: 2819 Page 10

Inventor: Steve YANG et al.

present invention, so as to mask the "objectionable noise" in the video signal or the audio signal.

To the contrary, Hiller neither discloses nor suggests this novel characteristic.

Furthermore, the offset signal of the present invention is generated by a microprocessor that is responsive to the brightness adjustment made by the user. The dither signal and the offset signal are scrambled or added together so as to mask objectionable noise in the input image signal and provide offset for the input image signal, respectively. In contrast, as shown in Hiller's Figure 6, Hiller feedbacks the digital output 28 to correlate the dither signal to the digital stream, and subtracts the pseudo random signal from PRN 16 through the digital adder in consideration of accuracy improvement. The present invention does not feedback the digital output to perform any correlation. Tellingly, the circuit operation, element combination, and purpose of Hiller's disclosure are totally different from those of the present invention.

Moreover, applicants respectfully note that the offset signal of the present invention has been erroneously construed by the examiner offsetting the dither signal. See, Office Action at page 2, lines 18-19. However, the offset signal of the present invention is employed to offset the input image signal.

Serial No.: 10/663,719 Attorney's Docket No.: MSS0006-US

Art Unit: 2819 Page 11

Inventor: Steve YANG et al.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

PILLSBURY WINTHROP SHAW PITTMAN LLP

1650 Tysons Boulevard

McLean, VA 22102

Tel: 703-770-7900

Respectfully submitted

STEVE YANG ET AL.

Date: August 23, 2005

By: Awrence D. Eisen

Registration No. 41,009

MB/LDE/ggb

Customer No. 28970

Document #: 1326680 v.2